



CHALOS & Co. P.C.

International Law Firm

55 Hamilton Avenue, Oyster Bay, New York 11771

TEL: +1-516-714-4300 FAX: +1-516-750-9051 WEB: www.chaloslaw.com EMAIL: info@chaloslaw.com

Honorable Magistrate Judge Sarah L Cave
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

Plaintiff's request at ECF No. 35 is GRANTED, and the proposed schedule set forth therein is ADOPTED.

The Clerk of Court is respectfully directed to close ECF No. 35.

SO ORDERED. 10/30/2023


SARAH L. CAVE
United States Magistrate Judge

Re: Techtronic Cordless GP v. Maersk A/S
Case No. 1:22-CV-09513-GHW-SLC
Consent Letter Motion for Adjournment of Briefing Schedule

Dear Magistrate Judge Cave –

Plaintiff Techtronic Cordless GP (hereinafter “Plaintiff”), by and through undersigned counsel, respectfully submits this letter motion pursuant to Section I.D. of this Honorable Court’s individual practices to request a short adjournment of the present briefing schedule. In support of the request, Plaintiff reports to the Court that there is a proposal for amicable resolution between the parties (which has been recommended by counsel for both parties). Counsel is awaiting final approval and sign-off from the respective clients and interested underwriters.

Accordingly, the parties respectfully request the scheduling order issued by this Court on September 18, 2023 (Doc. 33), be amended to extend the time for Defendant Maersk A/S to file its motion for partial summary judgment from October 27, 2023 to November 13, 2023. The current response and reply deadlines will remain in effect. Accordingly, the new proposed schedule is:

- November 13, 2023 – Motion for Partial Summary Judgment due;
- December 1, 2023 – Responses due;
- December 15, 2023 – Reply, if any, due.

All other dates and deadlines in this matter remain unchanged.